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MD, Kathy Dement, Rachel Ecleria, Katie Black, Andrea
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Melanie Menear

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**TAMMY L. THOMSEN, Personal
Representative of the Estate of DALE L.
THOMSEN, Deceased,**

Plaintiff,

v.

**NAPHCARE, INC., an Alabama
Corporation; WASHINGTON COUNTY, a
government body in the State of Oregon;
PAT GARRETT, in his capacity as Sheriff
for Washington County; ROBERT DAVIS,
an Individual; DON BOHN, an Individual;
JULIE RADOSTITZ, MD, an Individual;
MELANIE MENEAR, an Individual;
KATHY DEMENT, an Individual; RACHEL
ECLEVERIA, an Individual; KATIE BLACK,
an Individual; ANDREA GILLETTE, also
known as ANDREA GILLETTE, an**

Case No. 3:19-cv-00969-AC

**DEFENDANTS NAPHCARE, INC.,
JULIE RADOSTITZ, MD, KATHY
DEMENT, RACHAEL ECLERIA,
KATIE BLACK, ANDREA GILLETTE,
MORANG HINTHORNE, RACHEL
STICKNEY, AND MELANIE
MENEAR'S UNOPPOSED MOTION
TO EXTEND TIME TO APPEAR**

4835-4767-8621.1

DEFENDANTS NAPHCARE, INC., JULIE RADOSTITZ, MD, KATHY DEMENT,
RACHAEL ECLERIA, KATIE BLACK, ANDREA GILLETTE, MORANG
HINTHORNE, RACHEL STICKNEY, AND MELANIE MENEAR'S UNOPPOSED
MOTION TO EXTEND TIME TO APPEAR 1

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**Individual; MORGAN HINTHORNE, an
Individual; RACHEL STICKNEY, an
Individual; and JOHN/JANE DOES 1-10,,**

Defendants.

Defendants NaphCare, Inc., Julie Radostitz, MD, Kathy Dement, Rachael Ecleria, Katie Black, Andrea Gillette, Morang Hinthorne, Rachel Stickney, and Melanie Menear (collectively “defendants”) move the court for an order extending the time for them to answer or otherwise appear to August 19, 2019. The extension is needed to allow time to analyze claims, conduct a sufficient investigation, and prepare appearances.

This motion is made in good faith and not for the purpose of delay.

Counsel for plaintiff has no objection to this request.

DATED this 17th day of July, 2019.

s/ Jacqueline E. Houser, OSB #153539

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Radostitz, MD, Kathy Dement, Rachel Ecleria,
Katie Black, Andrea Gillette, Morang Hinthorne,
Rachel Stickney, and Melanie Menear*

CERTIFICATE OF SERVICE

I certify that I served the foregoing **DEFENDANTS NAPHCARE, INC., JULIE RADOSTITZ, MD, KATHY DEMENT, RACHAEL ECLERIA, KATIE BLACK, ANDREA GILLETTE, MORANG HINTHORNE, RACHEL STICKNEY, AND MELANIE MENEAR'S UNOPPOSED MOTION TO EXTEND TIME TO APPEAR** on the following attorneys by the method indicated below on the 17th day of July, 2019.

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